

Andrew Huntley
Development Management
Shropshire Council

17th March 2026

Dear Andrew

26/00328/OUT Residential development of up to 75 dwellings (all matters reserved except access), including 33% affordable housing, landscape and biodiversity enhancements (including off-site provision), drainage works, and means of access (including demolition of 23 Chelmick Drive).

The Shropshire Hills National Landscape Team **objects** to this application, for the reasons set out below.

Major development and not meeting exceptional circumstances tests

In *R (Aston) v Secretary of State for Communities and Local Government* the High Court concluded that “Major development” in designated landscapes is a matter of planning judgment, not a fixed quantitative test. On the basis of the following factors, we contend that this is uncontestably a ‘major development’:

- 75 dwellings is well above the normal “major development” threshold of 10 dwellings for development management procedure purposes, and represents a 3.3% increase on a town of 2,250 households – this is significant in the context of the local area and the National Landscape;
- the location is fully within the Shropshire Hills National Landscape;
- the greenfield nature of the site, development of which would extend the built form into open countryside;
- the impact on the landscape character of the area and setting of Church Stretton;
- the highly visible nature of the site from key view points on the surrounding hills;
- the high sensitivity of the location;
- the material impact on the tranquillity and character of this link between town and countryside;
- the site is located beyond the development boundary of the town.

In the light of the above it is considered that the proposal represents a Major development and as such paragraph 190 of the NPPF and the exceptional circumstances set out in it come into play. For the following reasons it is considered that the applicant has failed to demonstrate that the exceptional circumstances and public interest tests have been met:

- The need for the development in this location has not been fully demonstrated;
- The application does not include a rigorous or evidence based assessment of alternative sites, including brownfield locations within the Church Stretton development boundary (as defined by the extant Sites Allocations and Management of Development (SAMDev) Plan),

smaller exception sites within the National Landscape or other sites outside of the designated area;

- Many alternative sites to meet Shropshire's housing need have been put forward as part of the recent 'call for sites' which are currently undergoing assessment by Shropshire Council, part of which will include consideration of the impacts on the National Landscape - no comparison of the impacts of development in those locations on the National Landscape, its natural beauty and special qualities has been undertaken;
- The LVIA is inadequate for the reasons outlined below;
- The proposal fails to demonstrate how the detrimental impacts and harms that will result have been mitigated to such an extent as to enable a conclusion to be reached that the proposal 'furthers' the purposes of the designation.
- The impact on visitors and tourism in the area. Church Stretton is at the heart of the Shropshire Hills National Landscape area. According to the National Trust (2025) Carding Mill Valley attracts 250,000 per year. More visitors will walk the Stretton Hills and the Long Mynd enjoying the wide and extensive, views, the sense of space, place and landscape quality.

Outside the development boundary, relation to Development Plan and the 'tilted' balance (paragraph 11(d) NPPF)

The proposed development is contrary to the adopted, but dated, Development Plan. The site is not allocated for development and lies outside the defined development boundary as identified in the Sites Allocations and Management of Development (SAMDev) Plan 2025. There was no proposal to alter this boundary in the recently withdrawn draft Local Plan. The emerging draft Church Stretton Neighbourhood Plan, currently undergoing its 'Regulation 14 consultation', retains this development boundary.

Shropshire Council is unable to demonstrate a five-year housing land supply and as such paragraph 11(d) of the NPPF comes into play, however the tilted balance does not apply where NPPF policies protecting areas identified by footnote 7, which includes National Landscapes, provide a clear reason for refusal, which we believe they do.

Landscape value of the land in question

The Snatchfields site is a significant green wedge of land with public access through it and has ancient field patterns. The site is of high visual sensitivity as the land provides a valuable section of green open space within the development boundary, and linking strongly to the hillside above. The site is highly visible from many of the surrounding hills and forms a key part of the setting of Church Stretton.

The importance of the National Landscape has been downplayed by the Landscape & Visual Impact Assessment (LVIA) to reach a conclusion of not significant harm, with which we disagree.

The assessment of the impact on views contained within the Planning and Affordable Housing Statement makes only a single reference to 'views' (para 6.29) where it relates to boundary treatment. The word 'visibility' appears twice, each time in the context of 'visibility splays' for traffic.

The LVIA notes (page 26) that

"The localised setting is considered to be of scenic value despite the Site itself being influenced by residential built form on three sides. There is a dense woodland belt to the southeast which guides views towards Hazler Hill. Cross valley views towards the Long Mynd SSSI are sensitive when traversing north along the Jack Mytton Way LDR on-site".

Paragraph 3.36 which confirms that the wider landscape is *"considered Very High landscape value, it is considered that this receptor would typically display a High sensitivity."*

The assessment that follows is considered inadequate, given the site's location within an area of very high landscape value and high sensitivity.

- Insufficient viewpoints have been assessed, especially given the 'high sensitivity' of the wider landscape.
- The photographs of the site from Long Mynd contained within the LVIA demonstrate its key role in the landscape and setting of the town and the role it plays in the transition to open countryside. They demonstrate the role of the application site in those views.

The LVIA does not justify a conclusion of an acceptable level of harm from the proposal either on the receiving landscape character or existing views and visual amenity.

Special qualities and natural beauty

The application site lies fully within the designated Shropshire Hills National Landscape and contributes to the National Landscape through:

- its undeveloped rural character;
- its role in the settlement edge and the transition to countryside;
- its intervisibility from the town, the hills and surrounding area/ key viewpoints;
- its biodiversity; and
- its contribution to the landscape character

In essence it forms a valuable part of the landscape which the designation seeks to conserve and enhance. The case that the proposed development does not affect overall the special qualities of the National Landscape (because impacts are only to the land built on and to areas close by) is a fallacious argument that if true could be used to justify any development within a protected landscape. There is a real impact on land which is valuable to the landscape within the designated area and this is sufficient to justify refusal in line with national and local policies.

In *R (Forge Field Society) v Sevenoaks District Council*, the court stressed the need to properly evaluate harm in context, including the sensitivity of the location.

The proposed development would:

- introduce urbanising built form into currently open countryside;
- result in harm to the scenic quality of the landscape;
- impact directly and indirectly on priority habitats such as rush pasture and ancient and semi-natural woodland; and
- diminish the perceptual qualities of openness and tranquillity.

The magnitude of change would be noticeable and permanent and the visual impact would not be localised as the site is visible from many of the key view points on the Stretton Hills, Long Mynd and the Stretton Valley.

In the light of the above, it is considered that the proposal, will result in unacceptable harm to the natural beauty and special qualities of the Shropshire Hills National Landscape.

Duty 'to seek to further the purpose' of designation

The Levelling Up and Regeneration Act 2023 (LURA), section 245 (Protected Landscapes), requires that relevant authorities must 'seek to further' the statutory purposes of Protected Landscapes.

[Government guidance](#) for relevant authorities on seeking to further the purposes of Protected Landscapes was published on 16th December 2024 and notes that

"The duty is an active duty, not passive, which means:

- *a relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes*

- *as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes*
- *for development plan making and development management decisions affecting a Protected Landscape, a relevant authority should seek to further the purposes of the Protected Landscape - in so doing, the relevant authority should consider whether such measures can be embedded in the design of plans and proposals, where reasonably practical and operationally feasible.*

Further guidance from the National Landscapes Association on the strengthened duty is available at <https://national-landscapes.org.uk/guidance-for-relevant-authorities-on-the-countryside-and-rights-of-way-acts-strengthened-duty>. Failure to apply the statutory duty to seek to further the purposes of a National Landscape has been found to be an error of law.

We do not believe that approval of this application can be construed as seeking to further the purpose of the designation.

Approved Shropshire Hills National Landscape Management Plan 2025-2030

The Management Plan supports the provision of affordable housing, but sets out criteria in relation to this in Policy 22ii):

“Development of affordable housing within the National Landscape should be supported where:

- *development design is of high design quality, and has regard for local and traditional vernacular styles;*
- *density of development is sympathetic to existing housing density within the local area; and*
- *no significant adverse impacts upon the local community, landscape, nature, heritage, natural beauty, and tranquillity can be demonstrated.”*

We consider that these criteria are not met and the inclusion of 33% affordable housing in the application does not justify its approval.

The Stretton Valley and hills / A49 corridor local priorities section within the Plan (page 103) notes the particular sensitivity of this area:

“the need to retain character and limit the negative impacts of change and development is probably more acute here than anywhere else in the Shropshire Hills. Church Stretton is an important service centre but is also the only one of Shropshire’s defined market towns within a nationally protected landscape. The physical capacity for further development may be more limited than other towns, and it is important that the sensitivities of Church Stretton’s location within the National Landscape are fully considered in planning decisions.”

Evidence of opposition from the local community

We note the strong opposition from many in the local community and including Church Stretton Town Council.

Conclusion

The proposal is a major development which does not meet the necessary tests of exceptional circumstances. It fails to conserve and enhance the natural beauty of the National Landscape and would conflict with the statutory duty to seek to further its purposes. The application should be refused.

Yours sincerely

Phil Holden
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 Shropshire Hills National Landscape Team